

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

FILED

JUN 17 2002

Phil Lombardi, Clerk
U.S. DISTRICT COURT

HOWARD PEEPLES,

Plaintiff,

vs.

TULSA COUNTY SHERIFF'S
OFFICE, TULSA COUNTY
BOARD OF
COMMISSIONERS, and
TULSA COUNTY,

Defendant(s).

02CV 480K (J)
JURY TRIAL DEMANDED

FIRST CAUSE OF ACTION

Comes now the Plaintiff herein, and for his first cause of action, and alleges and states:

1. That the Plaintiff is an employee, and the Defendant an employer, as defined by the Civil Rights Act of 1964, and as defined by Title 42 Sec. 1981 of the United States Code.
2. That Plaintiff is Black.
3. That within the limitations period next preceding the filing of this action, the Defendant discriminated against the Plaintiff in his wages, hours and terms and conditions of his employment, due to Plaintiff's race.
4. That the Plaintiff filed with the appropriate agency, and has received a right-to-sue letter.

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5. That the acts or omissions of the Defendant were wilful, wanton and malicious, entitling the Plaintiff to punitive damages.

SECOND CAUSE OF ACTION


Plaintiff readopts and realleges each and every allegation set out above, and further alleges and states:

6. That pursuant to Title 42 U.S.C. Sec. 1981 Plaintiff is entitled to equal enforcement of his contract rights, and equal treatment in his contractual relations with the Defendant as those enjoyed by White citizens, but Plaintiff has been denied same, with regard to his wages, hours and working conditions.

7. That the acts or omissions of the Defendant have been wilful, wanton and malicious, entitling the Plaintiff to punitive damages, in an amount in excess of \$75,000.

WHEREFOR Plaintiff prays for damages from the Defendant on each cause of action for actual damages, on each cause of action in an amount in excess of \$75,000, and for punitive damages in excess of \$75,000, per cause of action, for costs including an attorney's fee, and for all other relief at law, or in equity.

Respectfully submitted,



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ATTORNEY FOR PLAINTIFF